

REMARKS

35 U.S.C. § 101

Applicant's claims are not directed to an abstract idea and the 35 U.S.C. § 101 rejection should be withdrawn.

Amendments to the Claims

Claims 1 and 6 have been amended for clarification and claim 13 is new. Claims 8 and 9 have been cancelled. Support for the amendments is found in paragraphs [0020], [0033] and [0070] of the specification. No new matter has been added.

35 U.S.C. § 102

Claims 1, 2, 4-6, 11, and 12 stand rejected under 35 U.S.C. § 102(c) as being anticipated by U.S. Patent Application Publication No. 2001/0050681 ("Keys"). For the reasons set forth below, Applicant submits that the currently pending claims are neither anticipated nor suggested by the Keys reference cited in the Office Action.

For anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. *See* MPEP § 706.02(a); *Verdegaal Bros. v. Union Oil Co.*, 814 F.2d 628, 631 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989); *see also* MPEP § 2131.

Keys discloses:

A system and method of generating an electrical graphical presentation on a computer system. A sample template is displayed and the user chooses one such sample template. An interactive web page, i.e., an editor template, that looks similar to the selected template and has editable fields

is displayed and edited. The supplied information is then used to generate a final presentation that is then delivered to the user.

(Keys at Abstract.)

Keys states:

FIG. 4 depicts the operational flow of the present invention. Initially, the process 400 begins when the user enters the web site at 402. Once the user has entered the web site, the user then selects or chooses a template. In a preferred embodiment, the user can browse through a gallery of available sample presentations or templates, allowing the user to view different options and experience editing the template in the editing interface. Each different option is a different type of presentation, each having different features. For example, the types of colors or graphics to be used, whether still slides or animation is used, and whether audio is going to be used, as well as other features and design preferences. The template may either provide single options that contain predetermined graphics, animation and audio components, or the templates may provide portions, allowing the user some choices in terms of mixing and matching the various components. The template may also allow the user to upload information such as custom images, video, or audio.

(*Id.* at [0040].)

Nowhere does the Keys disclose or suggest "at least one agent operatively associated with the messaging and collaboration system for dynamically generating (25) web scripts independently of the existing client database and from access to the template and the user information database in response to a user request" as recited in claims 1, 6 and 13.

Accordingly, Keys does not disclose or suggest all of the features of claims 1, 6 and 13, and the claims dependent thereon. As such, the grounds for rejection are unsupported by the cited art and Applicant respectfully requests withdrawal of this rejection.

35 U.S.C. § 103

Claims 3, 7, 9 and 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Keys in view of U.S. Patent Application Publication No. 2008/0294726 ("Sidman"). Claim 9 is no longer pending.

Applicant's application has an effective filing date of April 16, 2004, which is the date her PCT application was filed. Sidman was filed April 22, 2004 and published November 27, 2008, causing it to not be prior art. Accordingly, the § 103 rejection should be withdrawn.

Further, if the Office believes that citing Sidman is proper, the combination of Keys and Sidman does not disclose or suggest "at least one agent operatively associated with the messaging and collaboration system for dynamically generating (25) web scripts independently of the existing client database and from access to the template and the user information database in response to a user request" as recited in claims 1, 6 and 13. Claims 3 and 10 depend on claim 1 and claim 7 depends on claim 6. Consequently, combining Keys with Sidman does not render all of the features of claims 3, 7 and 10 obvious.

Accordingly, the grounds for the obviousness rejection are unsupported by the cited art and Applicant respectfully requests withdrawal of this rejection.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance.

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, objection, issue, or comment, including the Office Action's characterizations of a reference, does not signify agreement with or

concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment or cancellation of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment or cancellation. Since the amendments made herein have been made solely in an effort to expedite advancement of this case, Applicant reserves the right to prosecute the rejected claims in further prosecution of this or related applications.

Respectfully submitted,



Richard C. Weinblatt
Reg. No. 45,500

Date: November 8, 2010

Stamoulis & Weinblatt LLC
Two Fox Point Centre
6 Denny Road, Suite 307
Wilmington, DE 19809
Telephone: (302) 999-1540